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**BELLSOUTH**

Kathleen B. Levitz  
Vice President-Federal Regulatory

Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351  
202 463-4113  
Fax: 202 463-4198  
Internet: levitz.kathleen@bsc.bls.com

EX PARTE OR LATE FILED

Monday, October 26, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

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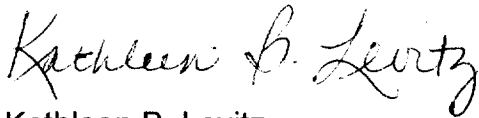
Re: Written Ex Parte in CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Andrea Kearney, a senior attorney in the Common Carrier Bureau's Policy and Program Planning Division. That ex parte consists of a copy of the document entitled *BellSouth-GA OSS Testing Evaluation Interim Status Report* that KPMG filed with the Georgia Public Service Commission on October 25, 1999. I also sent copies of the report to Bill Agee, a senior attorney in the Division and Carol Matthey, the chief of the Division.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in the docket identified above. Please associate this notification with the record in that proceeding.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Andrea Kearney (w/o attachment)  
William Agee (w/o attachment)  
Carol Matthey (w/o attachment)

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**Kathleen B. Levitz**  
Vice President-Federal Regulatory

Suite 900  
1133-21st Street, N.W.  
Washington, D.C. 20036-3351  
202 463-4113  
Fax: 202 463-4198  
Internet: levitz.kathleen@bsc.bls.com

October 25, 1999

WRITTEN EX PARTE

Ms. Andrea Kearney  
Policy and Program Planning Division  
Common Carrier Bureau  
Room 5-C330  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20554

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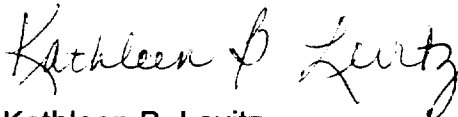
Re: CC Docket No. 98-121

Dear Ms Kearney:

Attached is a copy of the document entitled *BellSouth-GA OSS Testing Evaluation Interim Status Report* that KPMG filed with the Georgia Public Service Commission on October 25, 1999. I am sending this report to you in response to your request that BellSouth share with you any status reports prepared by KPMG as part of the third party testing program currently underway in Georgia. If you have any questions after reviewing the report, please call me at 202.463.4113.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, I am filing two copies of this written ex parte presentation with the Secretary of the Commission and requesting that it be associated with the record in the docket identified above.

Sincerely,



Kathleen B. Levitz

Attachment

cc: William Agee  
Carol Matthey





**BellSouth-GA OSS Testing Evaluation**  
**Interim Status Report**  
**October 25, 1999**

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## **1.0 Document Objective**

In this document, KPMG provides an interim summary status report on developments related to the BellSouth-GA OSS Testing Project. A brief overview of key developments is provided in section 2.0. Key upcoming activities are summarized in Section 3.0. A more detailed report on specific test items is provided in the table in section 4.0. Each item presented in the table in section 4.0 includes a reference number that identifies the item from a previous status report, where applicable.

## **2.0 Key Developments**

- Transition activities: KPMG and HP have completed the transitioning of Test Manager responsibilities to KPMG.
- Master Test Plan (MTP): A revised MTP, Version 3.0, and Flow-Through Evaluation, Version 2.0, were filed with the Georgia Public Service Commission on October 18, 1999.
- Exception process: The Commission, KPMG, and BellSouth have agreed on a process for identifying, addressing, and resolving exceptions (defects in components of systems, documentation, or processes) identified during the test.
- EDI Interface Testing: System readiness testing (SRT) has completed for all unbundled network element (UNE) order types planned for production submission, with the exception of UNE local number portability (LNP). Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of EDI LAN-to-LAN interface testing is scheduled.
- TAG Interface Testing: SRT has completed for pre-orders and for all UNE order types planned for production submission, except UNE-LNP. Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of TAG interface testing is scheduled.
- Test bed provisioning: The provisioning and validation of the Ordering functional test bed is behind schedule but nearing completion. Provisioning of the test beds for the Volume and Maintenance & Repair tests is in progress.
- Order management: KPMG is finishing the implementation of its Order Creation and Management tool, and is conducting end-to-end testing with HP and BellSouth.
- Billing test plans: The filing of the revised MTP has resulted in the need for modifications to the detailed test plans for all process-oriented tests. These revisions



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are in progress and are nearing completion. None of these activities is on the schedule critical path.

- Billing test bed: A limited number of issues with the ordering and provisioning of the test bed used for functional billing and usage tests have arisen. The source of the errors could be KPMG order submissions or BellSouth provisioning inconsistencies. Efforts are under way to prevent recurrence of the problems, and to ensure that the test objectives can be accomplished.

### **3.0 Key Upcoming Activities**

- KPMG and BellSouth are currently assessing the impact of delays in test bed provisioning on the overall test schedule. The assessment will be completed during the week of October 25, 1999.
- BellSouth is arranging for a visit by the CLEC Advisory Team to answer KPMG test team questions related to Pre-Order, Order, Billing, and Maintenance & Repair functions.
- KPMG will file the next interim status report during the week of November 15, 1999.



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**4.0 Specific Item Status**

Ref	Item	Status	Issues	Next Step/Resolution
I-1	Master Test Plan (MTP)	<ul style="list-style-type: none"><li>A revised MTP was filed with the Commission on 10/18/99.</li></ul>	<ul style="list-style-type: none"><li>A small number of minor errors have been identified in the new release.</li></ul>	<ul style="list-style-type: none"><li>KPMG will correct and file revised pages during week of 10/25/99.</li></ul>
I-2	Test bed development	<ul style="list-style-type: none"><li>KPMG has provided specifications for the Ordering and Provisioning (O&amp;P) test bed. Provisioning and validation of the functional test bed is nearing completion.</li></ul>	<ul style="list-style-type: none"><li>Test bed is not yet fully and accurately provisioned.</li></ul>	<ul style="list-style-type: none"><li>KPMG and BST are working to achieve complete and accurate provisioning of test bed.</li></ul>
		<ul style="list-style-type: none"><li>KPMG provided specifications for the Volume testing of the RSIMMS and production systems to BST. Provisioning of the test bed by BST is in progress.</li></ul>	<ul style="list-style-type: none"><li>BST is having difficulty finding exact matches in the RSIMMS database for some items included in the KPMG specification, e.g., business lines without directory listings.</li></ul>	<ul style="list-style-type: none"><li>KPMG will review available accounts in RSIMMS relative to the test bed specifications and will make adjustments to the requirements while maintaining the test objectives.</li></ul>
		<ul style="list-style-type: none"><li>KPMG provided specifications for the Maintenance &amp; Repair test bed. Provisioning of the test bed by BST is in progress.</li></ul>	<ul style="list-style-type: none"><li>KPMG specifications included products not offered by BST.</li></ul>	<ul style="list-style-type: none"><li>KPMG to revise specifications. BST to continue provisioning process.</li></ul>
		<ul style="list-style-type: none"><li>KPMG validation of billing test bed provisioning is in progress.</li></ul>	<ul style="list-style-type: none"><li>Validation identified some errors and inconsistencies in feature sets. Inconsistencies may be due to KPMG order errors or to BST provisioning faults.</li></ul>	<ul style="list-style-type: none"><li>KPMG will audit the switch features to ensure consistency with test cases and service orders. Change orders will be submitted where necessary.</li></ul>



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Ref	Item	Status	Issues	Next Step Resolution
I-6	EDI functional testing	<ul style="list-style-type: none"><li>• Four pre-test phases must be completed prior to the initiation of functional testing on the EDI LAN-to-LAN interface. This interface testing has completed for all UNE order types planned for production submission, with the exception of UNE-LNP.</li><li>• Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of EDI LAN-to-LAN interface testing is in progress.</li></ul>	<ul style="list-style-type: none"><li>• LNP interface and production testing cannot commence until facility and ordering information has been obtained from participating CLECs.</li></ul>	<ul style="list-style-type: none"><li>• See Ref # III-2: CLEC Participation – Ordering.</li></ul>
		<ul style="list-style-type: none"><li>• Test case templates have been developed.</li><li>• All test plans should receive final peer review by 10/29/99.</li></ul>	<ul style="list-style-type: none"><li>• None.</li></ul>	<ul style="list-style-type: none"><li>• KPMG will finalize test plans and submit for peer review.</li></ul>



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Ref	Item	Status	Issues	Next Step Resolution
I-7	TAG functional testing	<ul style="list-style-type: none"><li>• Four pre-test phases must be completed prior to the initiation of functional testing on the TAG interface. This interface testing has completed for pre-orders and for all UNE order types planned for production submission, except UNE-LNP.</li><li>• Additional interface testing needs to occur for Resale and LNP order types before production testing of these products can begin. This second session of TAG interface testing is in progress.</li></ul>	<ul style="list-style-type: none"><li>• LNP interface and production testing cannot commence until facility and ordering information has been obtained from participating CLECs.</li></ul>	<ul style="list-style-type: none"><li>• See Ref # III-2 CLEC Participation – Ordering.</li></ul>
		<ul style="list-style-type: none"><li>• Test case templates have been developed.</li><li>• All test plans should receive final peer review by 10/29/99.</li></ul>	<ul style="list-style-type: none"><li>• None.</li></ul>	<ul style="list-style-type: none"><li>• KPMG will finalize test plans and submit for peer review.</li></ul>
		<ul style="list-style-type: none"><li>• During pre-test activities, KPMG/HP received error messages indicating system processing limitations when 40 simultaneous communication sessions are running.</li></ul>	<ul style="list-style-type: none"><li>• Source of error could be with KPMG/HP or BST.</li></ul>	<ul style="list-style-type: none"><li>• KPMG/HP and BST will continue to investigate source of issue.</li></ul>
I-8	BLG-1 CRIS/CABS Invoicing Functional Test	<ul style="list-style-type: none"><li>• Test case execution began with submission of LSRs via EDI-PC for 9/28/99 billing cycle.</li><li>• Some LSRs submitted for 10/16/99 and 10/17/99 bill cycles did not post in time.</li></ul>	<ul style="list-style-type: none"><li>• Test case coverage included in 10/16/99 and 10/17/99 target cycles must be replicated in subsequent test cases targeted at future bill cycles.</li></ul>	<ul style="list-style-type: none"><li>• KPMG to develop recovery plan.</li></ul>





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Ref	Item	Status	Issues	Next Step Resolution
I-9	M&R Functional Testing - Connectivity	<ul style="list-style-type: none"><li>TAFI dial-up connectivity has been established; EC-CPM dial-up connectivity for ECTA access has not yet been established.</li></ul>	<ul style="list-style-type: none"><li>Required SecurID and user ID information to allow dial-up access to EC-CPM has not been entered.</li></ul>	<ul style="list-style-type: none"><li>BST will provide SecurIDs and enter KPMG user ID information to provide access to EC-CPM.</li></ul>
		<ul style="list-style-type: none"><li>BST has clarified that EC-CPM cannot be accessed through LAN-to-LAN.</li></ul>	<ul style="list-style-type: none"><li>Dial-up connectivity (the alternative to LAN-to-LAN) presents limitations for volume testing of ECTA. KPMG is assessing any impact of working through dial-up access on the current functional test plan.</li></ul>	<ul style="list-style-type: none"><li>BST to revise pages 2-13 of the document <i>Electronic Communication CPM Access</i> to clarify policy on ECTA access.</li><li>KPMG to develop alternative volume test strategy and to assess functional test plan impact, if any.</li></ul>



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Ref*	Item	Status	Issues	Next Step Resolution
II-1	Metrics	<ul style="list-style-type: none"><li>• BST has submitted a final list of metrics to be evaluated.</li><li>• BST has committed to expediting the interval for PMAP reporting, to the extent feasible, for KPMG evaluation purposes.</li></ul>	<ul style="list-style-type: none"><li>• If any PMAP reports cannot be expedited, KPMG may not have sufficient time to incorporate all test-CLEC metrics into the report.</li></ul>	<ul style="list-style-type: none"><li>• KPMG will confirm BST ability to expedite data delivery.</li></ul>
		<ul style="list-style-type: none"><li>• KPMG is developing computer code for validating PMAP metrics calculations for an individual CLEC using BST-provided PMAP raw data and documentation.</li></ul>	<ul style="list-style-type: none"><li>• Some BST raw data undergo filtering prior to being reported to evaluate duplicate or invalid reports. This introduces an additional step to the data comparison process.</li></ul>	<ul style="list-style-type: none"><li>• KPMG will determine whether it can replicate the filtering.</li></ul>
		<ul style="list-style-type: none"><li>• KPMG submitted a request for data and documentation concerning metrics not covered by the PMAP system; KPMG plans to develop computer code for metrics not covered by PMAP following data delivery.</li></ul>	<ul style="list-style-type: none"><li>• None.</li></ul>	<ul style="list-style-type: none"><li>• BST to provide non-PMAP data/documentation.</li></ul>
		<ul style="list-style-type: none"><li>• KPMG is evaluating the correspondence between data collected by KPMG functional test domains and BST-recorded data for the KPMG CLEC.</li></ul>	<ul style="list-style-type: none"><li>• Performance results comparisons can be conducted only for transactions submitted and recorded by the KPMG CLEC functional test domains.</li></ul>	<ul style="list-style-type: none"><li>• KPMG to complete evaluation of correlation between KPMG CLEC and BST data.</li></ul>



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Ref	Item	Status	Issues	Next Step Resolution
II-2	Project Plan/Schedule	<ul style="list-style-type: none"><li>KPMG issued a project plan/schedule on 9/14/99 and issued revisions to the schedule on 10/4/99.</li></ul>	<ul style="list-style-type: none"><li>Volume of KPMG test bed requirements has exceeded BST expectations, which has increased the provisioning process duration.</li><li>KPMG verification of test bed accounts has uncovered some inconsistencies with specifications. Re-provisioning activities are extending the test bed delivery timeframe.</li></ul>	<ul style="list-style-type: none"><li>KPMG and BST are assessing the impact of delays in test bed provisioning on the overall test schedule. Assessment will be completed during the week of 10/25/99.</li></ul>
II-4	Volume Test	<ul style="list-style-type: none"><li>KPMG has re-issued test bed specification to BST based on volume forecasts, system requirements, and test case coverage. Test bed is currently being provisioned by BST.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>As part of the initial stages of the functional evaluation of EDI and TAG, KPMG will validate transactions to be used in the volume test for syntax and ability to flow through.</li></ul>
II-5	Change Management	<ul style="list-style-type: none"><li>Forecasting test was removed from scope in MTP version 3.0.</li><li>Detailed Change Management test plan has been completed and is undergoing peer review.</li><li>Entrance criteria for Change Management test have been satisfied.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will commence evaluation with formal BST personnel interviews on 11/4/99.</li></ul>
III-1	Flow-Through Evaluation	<ul style="list-style-type: none"><li>Revised test plan for the flow-through evaluation was filed with BST and the Georgia PSC on 10/18/99. Revised plan provides more specific description of work to be performed for the evaluation.</li><li>KPMG metrics team has received the July, August, &amp; September 1999 flow-through reports.</li></ul>	<ul style="list-style-type: none"><li>None.</li></ul>	<ul style="list-style-type: none"><li>KPMG will develop detailed test execution plan integrated with EDI/TAG functionality and metrics components of Order test.</li></ul>



**BellSouth-GA OSS Testing Evaluation  
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III-2	CLEC Participation - Ordering	<ul style="list-style-type: none"><li>• KPMG distributed a letter to CLECs currently collocated in the seven Central Offices included in the test to solicit participation in aspects of Ordering and Provisioning tests. Five CLECs have expressed interest in assisting with LNP and CLEC-to-CLEC migration orders.</li></ul>	<ul style="list-style-type: none"><li>• KPMG requires facilities and account information from CLECs to generate order transactions to migrate fictitious BST customers to the CLECs (LNP and CLEC-to-CLEC). KPMG cannot process these orders types as a virtual CLEC without a switch.</li></ul>	<ul style="list-style-type: none"><li>• Conference call scheduled for 10/22/99 with CLECs and GA PSC to review requirements.</li></ul>
III-3	Capacity Management	<ul style="list-style-type: none"><li>• Detailed test plans for capacity management evaluations of TAG, EDI, TAFI, ECTA, CRIS, CABS, and ODUF/ADUF have been completed and submitted for peer review.</li><li>• Requests for capacity management system and process documentation and interviewee lists were submitted to BST on 10/19/99.</li></ul>	<ul style="list-style-type: none"><li>• None.</li></ul>	<ul style="list-style-type: none"><li>• KPMG will receive and review documentation.</li><li>• KPMG will schedule and conduct interviews</li></ul>

\*Referencing Methodology: An item referenced as I-n indicates that the item was first discussed in the July 22, 1999 status report. An item referenced as II-n indicates that the item was first referenced in the September 10, 1999 status report. An item referenced as III-n indicates that the item is new for this report.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

Jim Hurt, Director  
Consumers' Utility Counsel  
2 Martin Luther King Jr. Drive  
Plaza Level East  
Atlanta, GA 30334-4600

Newton M. Galloway  
Newton Galloway & Associates  
Suite 400 First Union Bank Tower  
100 South Hill Street  
Griffin, GA 30229

Charles A. Hudak, Esq.  
Gerry, Friend & Saponov, LLP  
Three Ravinia Drive, Suite 1450  
Atlanta, GA 30346-2131

Kent Heyman, General Counsel  
MGC Communications  
3301 N. Buffalo Drive  
Las Vegas, NV 89129

Suzanne W. Ockleberry  
AT&T  
1200 Peachtree Street, NE  
Suite 8100  
Atlanta, GA 30309

John M. Stuckey, Jr.  
Terri M. Lyndall  
Webb, Stuckey & Lindsey  
Harris Tower, Peachtree Center  
233 Peachtree Street, 14<sup>th</sup> Floor  
Atlanta, GA 30303

Charles V. Gerkin, Jr.  
Smith, Gambrell & Russell, LLP  
Promenade II, Suite 3100  
1230 Peachtree Street, N.E.  
Atlanta, GA 30309-3592

Frank B. Strickland  
Wilson, Strickland & Benson  
One Midtown Plaza, Suite 1100  
1360 Peachtree Street, NE  
Atlanta, GA 30309

Jeremy D. Marcus, Esq.  
Blumenfeld & Cohen  
Co-Counsel for Rhythm, fka ACI Corp.  
1625 Massachusetts Avenue, N.W.  
Suite 300  
Washington, DC 20036

Scott A. Sapperstein  
Sr. Policy Counsel  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619

John P. Silk  
Georgia Telephone Association  
1900 Century Boulevard, Suite 8  
Atlanta, GA 30345

Thomas K. Bond  
Georgia Public Service Commission  
47 Trinity Avenue, S.W.  
Atlanta, GA 30334

Eric J. Branfman  
Richard M. Rindler  
Swidler & Berlin  
3000 K Street, NW, Suite 300  
Washington, DC 20007

James G. Harralson  
BellSouth Long Distance  
32 Perimeter Center East  
Atlanta, GA 30346

Robert A. Ganton  
Regulatory Law Office  
Dept. Army  
Suite 700  
901 N. Stuart Street  
Arlington, VA 22203-1837

Charles F. Palmer  
Troutman Sanders LLP  
5200 NationsBank Plaza  
600 Peachtree Street, NE  
Atlanta, GA 30308-2216

Peter C. Canfield  
Dow Lohnes & Albertson  
One Ravinia Drive, Suite 1600  
Atlanta, GA 30346

Judith A. Holiber  
One Market  
Spear Street Tower, 32nd Floor  
San Francisco, CA 94105

James M. Tennant  
Low Tech Designs, Inc.  
1204 Saville Street  
Georgetown, SC 29440

Laureen McGurk Seeger  
Morris, Manning & Martin  
1600 Atlanta Financial Center  
3343 Peachtree Road, NE  
Atlanta, GA 30326-1044

Peyton S. Hawes Jr.  
127 Peachtree Street, NE  
Suite 1100  
Atlanta, GA 30303-1810

Daniel Walsh  
Assistant Attorney General  
Office of the Attorney General  
40 Capitol Square  
Atlanta, GA 30334-1300

Mark Brown  
Director of Legal and Government Affairs  
MediaOne, Inc.  
2925 Courtyards Drive  
Norcross, GA 30071

Cecil L. Davis Jr.  
NEXTLINK Georgia, Inc.  
4000 Highlands Parkway  
Smyrna, GA 30082

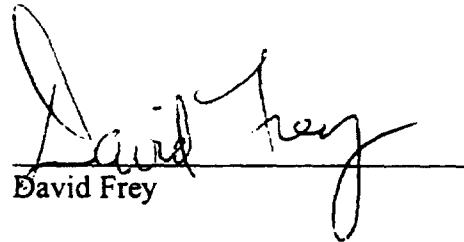
Jeffrey Blumenfeld  
Elise P. W. Kiely  
Blumenfeld & Cohen  
1615 M Street, N.W.  
Suite 700  
Washington, DC 20036

John McLaughlin  
KMC Telecom Inc.  
Suite 170  
3025 Breckinridge Boulevard  
Duluth, GA 30096

James A. Schendt  
Regulatory Affairs Manager  
Interpath Communications, Inc.  
P. O. Box 13961  
Durham, NC 27709-3961

Fred McCallum, Jr.  
125 Perimeter Center West  
Room 376  
Atlanta, GA 30346

This 25<sup>th</sup> day of October, 1999.



David Frey

KPMG  
303 Peachtree Street, N.E.  
Suite 2000  
Atlanta, Georgia 30308  
(404) 222-3000